

1 TERRY ROSS, CASB No. 58171
 terry.ross@kyl.com
 2 AUDETTE PAUL MORALES, CASB No. 216631
 audette.morales@kyl.com
 3 KEESAL, YOUNG & LOGAN
 A Professional Corporation
 4 400 Oceangate, P.O. Box 1730
 Long Beach, California 90801-1730
 5 Telephone: (562) 436-2000
 Facsimile: (562) 436-7416
 6
 Attorneys for Defendants
 7 WACHOVIA SECURITIES, LLC and MARK WIELAND

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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION
 12

13 VIOLETTA ETTARE,) Case No. C-07-04429-JW (PVT)
 14)
 Plaintiff,)
 15 vs.)
) DECLARATION OF PAUL WALDMAN
) IN SUPPORT OF DEFENDANTS' JOINT
) AMENDED NOTICE OF REMOVAL OF
 16 JOSEPH E. BARATTA, an individual,) ACTION
 TBIG FINANCIAL SERVICES, INC., form)
 17 of business unknown, WACHOVIA)
 SECURITIES, LLC, a Delaware Limited)
 18 Liability Company, MARK WIELAND, an)
 individual, and DOES 1-25,)
 19)
 Defendants.)
 20)

21
 22 I, PAUL WALDMAN, declare as follows:

23 1. I have personal knowledge of the facts herein, and if called to testify
 24 as a witness, could and would testify competently thereto.

25 2. I am a duly elected officer of Wachovia Securities, LLC ("Wachovia
 26 Securities") in New York holding the titles of Senior Vice President and Corporate
 27 Counsel.

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3. Since before Plaintiff VIOLETTA ETTARE filed her complaint in this matter on July 13, 2007, and through the present, Wachovia Securities has been a limited liability company organized under the laws of Delaware, having its principal place of business in Richmond, Virginia.

4. Since before July 13, 2007 and through the present, Wachovia Securities has been owned entirely by Wachovia Securities Financial Holdings, LLC ("WSFH").

5. Since before July 13, 2007 and through the present, WSFH has been a limited liability company organized under the laws of the State of Delaware and has had its principal place of business in Richmond, Virginia.

6. Since before July 13, 2007 and through the present, WSFH has consisted of two members: Prudential Securities Group Inc. ("PSG"), which has a 38% interest in WSFH, and Wachovia Securities Holdings, LLC ("WSH"), which has a 62% interest in WSFH.

7. Since before July 13, 2007 and through the present, WSH has been organized under the laws of the State of Delaware and has had its principal place of business in Charlotte, North Carolina.

8. Since before July 13, 2007 and through the present, WSH has been owned entirely by Everen Capital Corporation ("Everen").

9. Since before July 13, 2007 and through the present, Everen has been incorporated under the laws of the State of Delaware and has had its principal place of business in Charlotte, North Carolina.

Executed this 27th day of February, 2008 at New York, New York.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


PAUL WALDMAN